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6 UNITED STATES BANKRUPTCY COURT

7 NORTHERN DISTRICT OF CALIFORNIA

9 IN RE: CASE No. 17-10828 WJL

10 FLOYD E. SQUIRES, III and CHAPTER 11
BETTY J. SQUIRES,

11 Debtors. /

MOTION FOR ORDER AUTHORIZING
FURTHER USE OF CASH COLLATERAL

12 Date: March 8, 2018

Time: 3:30 p.m.

13 Place: 1300 Clay St., Rm. 220
Oakland, CA
14

15 TO: HONORABLE WILLIAM J. LAFFERTY, JUDGE, UNITED STATES
16 BANKRUPTCY COURT:

17 FLOYD E. SQUIRES, III and BETTY J. SQUIRES, Debtors herein,
18 hereby move the above entitled Court for an Order Authorizing
19 Further Use of Cash Collateral.

20 Said Motion is made on the grounds that the secured creditor is
21 adequately protected by the real property collateral and that
22 continued use of the rents produced by the real property collateral
23 is necessary to maintain the subject property for the tenants and
24 payment of senior encumbrances and real property taxes as same come
25 due. A health and safety receiver is in possession of the subject
26 real property collateral pursuant to Order of the Superior Court
27 with powers limited to real property code violation corrections
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1 mandated by the City of Eureka.

2 Said Motion is made and based on the within Motion, the
3 Declaration of Floyd Squires and the Memorandum of Points and
4 Authorities served and filed herewith.

5 Dated: 3/5/18

DAVID N. CHANDLER, p.c.

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By: /s/David N. Chandler

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David N. Chandler

Attorneys for Debtors

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